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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re  
THE LITIGATION PRACTICE GROUP P.C.,  
Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

RESPONSE AND RESERVATION OF  
RIGHTS TO MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY UNDER  
11 U.S.C. §362 FILED BY ALTERYX, INC.  
[DK 396]

Hearing

Date: August 29, 2023

Time: 10:30 a.m.

Ctrm: 5C – Virtual<sup>1</sup>

411 West Fourth Street  
Santa Ana, CA 92701

TO THE HONORABLE JUDGE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
COURT JUDGE, DEBTOR, THE UNITED STATES TRUSTEE, DEBTOR’S COUNSEL, AND  
ALL INTERESTED PARTIES:

Richard A. Marshack, in his capacity as the Chapter 11 Trustee (“Trustee”) of the bankruptcy  
estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor” or “LPG”), submits the following  
response and reservation of rights to the motion for relief from the automatic stay or for order

<sup>1</sup> This hearing date is designated Zoom Only, pursuant to Judge Clarkson’s self-calendaring procedures. Video and audio  
connection information for each hearing will be provided on Judge Clarkson’s publicly posted hearing calendar, which  
may be viewed online at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>.

1 confirming that the automatic stay does not apply under 11 U.S.C. § 362(l) (Unlawful Detainer)  
2 (“MRF” or “Motion”), filed by Alteryx, Inc. (“Alteryx”), on August 17, 2023, as Dk. No. 396.

3 On August 17, 2023, as Dk. No. 398, Alteryx filed an application for order setting hearing on  
4 shortened notice on the MRF (“Application”). On August 17, 2023, as Dk. No. 399, the court  
5 entered an order granting the Application and set a hearing on shortened notice on the Motion for  
6 August 29, 2023 at 10:30 a.m.; set written opposition to the Motion for August 23, 2023; and reply  
7 for August 28, 2023.

8 Trustee does not oppose Alteryx’s MRF with respect to regaining possession and mitigating  
9 its damages. That said, with respect to any claim that Alteryx may assert against the Estate – and  
10 vice versa – Trustee reserves all rights, claims and defenses.

11  
12 DATED: August 23, 2023

MARSHACK HAYS WOOD LLP

13  
14 By: /s/ Laila Masud  
15 D. EDWARD HAYS  
16 LAILA MASUD  
17 Attorneys for Chapter 11 Trustee,  
18 RICHARD A. MARSHACK  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **RESPONSE AND RESERVATION OF RIGHTS TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. §362 FILED BY ALTERYX, INC. [DK 396]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **August 23, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On **August 23, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

**MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST, SUITE 100  
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **August 22, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY**

**PRESIDING JUDGE'S COPY**

HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT, CENTRAL  
DISTRICT OF CALIFORNIA  
RONALD REAGAN FEDERAL BUILDING AND  
COURTHOUSE  
411 WEST FOURTH STREET, SUITE 5130 /  
COURTROOM 5C  
SANTA ANA, CA 92701-4593

**VIA PERSONAL DELIVERY AND OVERNIGHT MAIL**

OFFICE OF THE UNITED STATES TRUSTEE  
411 WEST FOURTH STREET  
SUITE 7160  
SANTA ANA, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 23, 2023

*Date*

Chanel Mendoza

*Printed Name*

/s/ Chanel Mendoza

*Signature*

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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